

1 Scott L. Poisson, Esq.  
2 Nevada Bar No.: 10188  
3 Amber N. King, Esq.  
4 Nevada Bar No.: 14070  
5 **BERNSTEIN & POISSON**  
6 700 South Jones  
7 Las Vegas, Nevada 89107  
8 (702) 256-4566  
9 (702) 256-6280 fax  
10 Attorneys for Plaintiff

11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 ELVIA WILLIAS, an individual,  
14 Plaintiff,

15 v.

16 99 CENTS ONLY STORES, LLC., and; DOES 1  
17 through 100; and ROE CORPORATION 101  
18 through 200, inclusive,  
19 Defendant(s).

Case No.: 2:22-cv-139-APG-BNW

20 **STIPULATION AND PROPOSED**  
21 **ORDER FOR EXTENSION OF**  
22 **DISCOVERY DEADLINES**  
23 **[SECOND REQUEST]**

24 Plaintiff, Elvia Williams, by and through her counsel of record, the law firm of  
25 **Bernstein & Poisson** and Defendant, 99 Cents Only Stores, by and through its attorneys  
26 of record, hereby stipulate and request to extend the respective Discovery Deadlines in this  
27 case as follows:

28 **I. DISCOVERY COMPELTED TO DATE**

All parties have served disclosures of documents and witnesses. All parties have  
served and responded to interrogatories, requests for production of documents, and  
request for admissions. The deposition of Plaintiff has been completed.

**DISCOVERY REMAINING**

1. Deposition of Defendant or 30(b)(6)

1 2. Independent Medical Examine of Plaintiff

2 3. Expert Disclosures

3 **II. THE REASONS WHY THE DISCOVERY REMANINING CANNOT BE**  
4 **COMPLETED WITHIN THE TIME LIMITS SET BY THE DISCOVERY**  
5 **ORDER**

6 The parties have diligently been obtaining the necessary discovery in this matter,  
7 however, due to the COVID-19 restrictions and delays, some discovery, including  
8 depositions of non-party witnesses have not been able to be completed. Accordingly, the  
9 parties request a 60-day extension of the discovery deadlines.

10 **III. CURRENT DEADLINES**

- 11 1. November 15, 2022 – close of discovery.  
12 2. Closed – final date to amend pleadings and add parties.  
13 3. September 16, 2022 – final date to make expert disclosures.  
14 4. October 17, 2022 – final date to make rebuttal expert disclosures.  
15 5. December 15, 2022 – final date to file dispositive motions.

16  
17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

**IV. Proposed Schedule For Completing All Remaining Discovery**

1. January 13, 2022 – close of discovery.
2. Closed – final date to amend pleadings and add parties.
3. November 15, 2022 – final date to make expert disclosures.
4. December 16, 2022 – final date to make rebuttal expert disclosures.
5. February 13, 2023 – final date to file dispositive motions.

**BERNSTEIN & POISSON**

**PERRY, SPANN, & WESTBROOK, P.C**

**DATED: SEPTEMBER 14, 2022**

**DATED: SEPTEMBER 14, 2022**

/s/ Amber N. King  
Scott L. Poisson, Esq.  
Nevada Bar No.: 10188  
Amber N. King, Esq.  
Nevada Bar No.: 14070  
700 South Jones Blvd.,  
Las Vegas, Nevada 89107  
*Attorneys for Plaintiff*

/s/ Lew Brandon, Jr.  
Lew Brandon, Jr., Esq.  
Nevada Bar No. 5880  
Andrew Guzik, Esq.  
Nevada Bar No. 12758  
139 E. Warm Springs Road  
Las Vegas, NV 89119  
*Attorneys for Defendant*

**ORDER**

IT IS ORDERED that ECF No. 15 is GRANTED in part and DENIED in part. It is granted in all respects except that the discovery cut off shall be January 13, 2023.

IT IS SO ORDERED

DATED: 1:36 pm, September 19, 2022



BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE

**Sabina Damelas**

---

**From:** Andrew Guzik <a.guzik@bsnv.law>  
**Sent:** Wednesday, September 14, 2022 11:47 AM  
**To:** Sabina Damelas; Amber King  
**Cc:** April Rufus; Maybelline Valle; Homero Gonzalez  
**Subject:** RE: Elvia Williams v. 99 Cents Only Stores

You can add my electronic signature to the stipulation. Thanks

ANDREW GUZIK, ESQ.  
BRANDON | SMERBER LAW FIRM  
139 E. WARM SPRINGS RD.  
LAS VEGAS, NEVADA 89119  
TEL. 702-380-0007  
FAX. 702-380-2964

---

**From:** Maybelline Valle <M.Valle@bsnv.law>  
**Sent:** Wednesday, September 14, 2022 9:52 AM  
**To:** Andrew Guzik <a.guzik@bsnv.law>; Homero Gonzalez <H.Gonzalez@bsnv.law>  
**Cc:** April Rufus <a.rufus@bsnv.law>  
**Subject:** FW: Elvia Williams v. 99 Cents Only Stores

Please see attached proposed SAO to Extend Discovery.

Best Regards,

*Maybelline Valle*, Legal Assistant to  
Lew Brandon, Jr. Esq.  
Andrew Guzik, Esq.  
Homero Gonzalez, Esq.  
David Spurlock Jr., Esq.  
**BRANDON | SMERBER LAW FIRM**  
139 E. Warm Springs Rd.  
Las Vegas, NV 89119  
Tel: 702-380-0007  
Fax: 702-380-2964

The information contained in the electronic message is legally privileged and confidential under applicable law, and is intended only for the use of the individual or entity named above. If the recipient of this message is not the above-named intended recipient, you are hereby notified that any dissemination, copy or disclosure of this communication is strictly prohibited. If you have received this communication in error, please notify Brandon | Smerber Law Firm at (702) 380-0007 and permanently delete the communication immediately without making any copy or distribution.

---

**From:** Sabina Damelas <[Sabina@vegashurt.com](mailto:Sabina@vegashurt.com)>  
**Sent:** Wednesday, September 14, 2022 9:38 AM  
**To:** Maybelline Valle <[M.Valle@bsnv.law](mailto:M.Valle@bsnv.law)>  
**Cc:** Amber King <[amber@vegashurt.com](mailto:amber@vegashurt.com)>  
**Subject:** FW: Elvia Williams v. 99 Cents Only Stores